

RQ-2

April 9, 2013

ANNIE HILL, TREASURER COMMUNICATIONS WORKERS OF AMERICA WORKING VOICES 501 3RD STREET, NW WASHINGTON, DC 20001

Response Due Date 05/14/2013

IDENTIFICATION NUMBER: C00488486

REFERENCE: 30 DAY POST-GENERAL REPORT (10/18/2012 - 11/26/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 1 item(s):

- 1. Schedule B of your report discloses in-kind contributions to your committee. Please be advised that the value of in-kind contributions must be added to the receipts and disbursements total in order to avoid either inflating or deflating the cash on hand amount, and itemized on the appropriate Schedules A and B. (11 CFR § 104.13(a)) Please amend your report by itemizing the in-kind contributions on Schedule A.
- Schedule B of your report discloses an expenditure(s) for "Member Communication" and "MEDIA PURCHASE." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.
- Schedule E for Line 24 of your report discloses MEMO entries for apparent independent expenditures made on behalf of several candidates during this reporting period. On Schedule B supporting Line 21(b) you disclose

COMMUNICATIONS WORKERS OF AMERICA WORKING VOICES

Page 2 of 2

disbursements which appear to correspond to the memo entries disclosed on Schedule E. Please be advised that if a communication is aired and paid for in the same reporting period, the independent expenditure should only be disclosed on Schedule E supporting Line 24 as a non-memo entry.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,

Laura Sinram

Senior Campaign Finance Analyst

Jaura E. Sinran

Reports Analysis Division